

DOCKET NO. UWY-CV-14-6026552-S	:	SUPERIOR COURT
	:	
NUCAP INDUSTRIES INC., NUCAP US	:	J.D. WATERBURY
INC., as successor to ANSTRO	:	
MANUFACTURING, INC.;	:	AT WATERBURY
	:	
Plaintiffs,	:	SEPTEMBER 21, 2016
	:	
VS.	:	
	:	
PREFERRED TOOL AND DIE, INC.,	:	
PREFERRED AUTOMOTIVE	:	
COMPONENTS, a division of PREFERRED	:	
TOOL AND DIE; and ROBERT A. BOSCO,	:	
JR.,	:	
	:	
Defendants.	:	

PLAINTIFFS' MOTION TO SEAL

Pursuant to Practice Book Sections 7-4B, 7-4C, and 11-20A, Plaintiffs, Nucap Industries Inc. and Nucap US Inc., hereby move for an Order sealing limited portions of their Memorandum of Law in Support of their Motion for an Order of Compliance (“Motion” or “Memorandum of Law”). As is more fully set forth in the accompanying memorandum of law, the documents to be sealed contains documents and testimony designated under the Protective Order as either Confidential or Confidential-Attorneys’ Eyes Only by Defendants, Preferred Tool and Die, Inc. and Preferred Automotive Components (“Preferred”). Although Plaintiffs do not necessarily agree that all the documents and materials designated by Preferred as Confidential or Confidential Attorneys’ Eyes Only warrant the protection imposed by Preferred, Plaintiffs file this motion in accordance with the terms the Protective Order requiring such materials to be filed under seal.

WHEREFORE, for these reasons and those stated in the supporting memorandum of law Plaintiffs move that the Court enter an order directing that Plaintiffs’ Memorandum of Law in

support of its Motion for Compliance and Exhibits B, C, and H thereto be filed under seal. In accordance with Practice Book Practice Book Sections 7-4B, 7-4C, and 11-20A, Plaintiffs will lodge an unredacted version of its Motion, Memorandum of Law, and all supporting exhibits with the Court, and will simultaneously file a redacted version of its Motion and Memorandum of Law on the Court's public docket.

PLAINTIFFS,
NUCAP INDUSTRIES, INC. and NUCAP US,
INC.

By /s/ Stephen W. Aronson

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CERTIFICATION

This is to certify that a copy of the foregoing was mailed, postage prepaid or delivered electronically or non-electronically, on this 21st day of September 2016 to all counsel and self-represented parties of record, as follows:

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